

PRIVACY NOTICE of BDPST Koncept

Korlátolt Felelősségű Társaság

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Privacy Notice of BDPST Koncept Korlátolt Felelősségű Társaság

Please read this Notice carefully in order to understand how we process your personal data. If you have any questions, please contact us using any of the contact details provided. Don't hesitate to contact us.

BDPST Koncept Kft., as Controller (hereinafter: Controller), respects the privacy of all individuals who provide personal data and is committed to protecting these data.

This Notice applies equally to our guests, clients, employees working for our clients, website visitors, hotel guests, partners, suppliers (and potential suppliers), as well as all their employees.

In the course of its operations, BDPST Koncept Kft. uses the assistance of external partners for certain tasks. In performing these tasks, it maintains a contractual relationship with its partners, and these contracts address the rules of processing. With these partners, it has a joint Controller or processor relationship, and the principles of this Privacy Policy apply equally to these partners. For each processing activity, the name, registered office, and contact details of the partner are indicated in this Notice.

The principles of processing by BDPST Koncept Kft. are as follows.

I. Controller details

Name:	BDPST Koncept Kft.
Registered office:	H-1026 Budapest, Pasaréti út 122-124
Email:	info@bdpstkoncept.hu

II. Principles of processing

II./1. Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly, and in a manner that is transparent to you. But what does this mean exactly? Let's look at it in more detail.

Lawfulness and fairness mean that personal data must always be obtained by lawful and fair means, and these must be maintained throughout the entire period of processing. It is also necessary for the processing to have an appropriate legal basis. The GDPR defines several, specifically 6, legal bases on which we may process your data. These are consent, performance of a contract, legal obligation, vital interests, public interest, and the legitimate interests of the Controller. You can read more about these legal bases in the chapter entitled Legal bases for processing.

And of course, transparency, which means that processing must always be carried out in such a way that you are aware of all circumstances affecting you throughout the entire period of processing, for example, which of your data we process, for what purpose, for how long, whether we transfer your data to a third party (e.g. to your accountant), or whether we transfer your data to a Controller or processor operating in a country outside the European Union. Transparency includes your right to be informed of all this, and our obligation to bring all this to your attention.

It is important to know, however, that the obligation to provide information also has its limits. Providing information does not mean that we must personally contact everyone whose data we process, but you must always be informed of the fact of processing. The manner of providing information is regulated by several laws and there are also opinions on the matter; for example, in certain cases, for companies with a website – as is the case with us – it is sufficient to provide information via a notice placed on the website. But there are also strict cases, for example, when we are required to notify the data subject of a specific change in processing by email.

The GDPR also requires that if we do not obtain your personal data from you but from someone else, you must be informed as soon as possible, at the first contact, but no later than within 1 month.

II./2. Necessity and proportionality

A fundamental right may only be restricted when necessary and in proportionate fashion. Necessity means that processing is absolutely necessary to achieve the purpose of processing. Proportionality sets the boundaries of this necessity by requiring that any restriction of fundamental rights and freedoms necessary for processing must also be proportionate to the objective.

The Fundamental Law states that a fundamental right may be restricted for the enforcement of another fundamental right or for the protection of a constitutional value, to the extent strictly necessary, proportionate to the objective to be achieved, and with respect for the essential content of the fundamental right. When processing your data, we always fully comply with the principles of necessity and proportionality.

II./3. Purpose limitation

We collect personal data only for specified, explicit and legitimate purposes, and do not process them in a manner incompatible with those purposes. That is, before each processing operation, we define the purpose of processing and process the data only for that purpose. This purpose is never contrary to the law. However, it is important to know that we may process a particular data of yours for several purposes, but in such cases, we always regulate the processing separately for each purpose. An example of this: we process your name for the purpose of a quotation request, and later, when you become our customer, for performance, and after the purchase, for invoicing purposes as well. In these three cases, the purposes of processing are clearly distinct, as in the case of a quotation request, we process your data for the preparation of a contract, after the order for the performance of the contract, and after issuing the invoice, for compliance with a legal obligation.

However, processing may also take place for several purposes simultaneously. (For example, after performance of the contract, we may retain documents and data on the basis of legitimate interest, for possible evidence in a subsequent legal dispute, while the same data on the invoice are processed due to a statutory data retention obligation.)

If the purposes of processing change, you must always be informed of this.

Furthermore, pursuant to the GDPR, further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes is not considered incompatible with the original purpose.

II./4. Data minimisation

We store personal data in a manner that is adequate and relevant in relation to the purposes of processing and limit it to what is necessary. We do not process data that is not necessary to achieve the purpose.

II./5. Accuracy

We store personal data accurately and up to date to the best of our knowledge. Where possible, we take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay. However, unrealistic expectations cannot be placed on a Controller. We cannot call everyone every day to check if their name is still the same. However, if you become aware that your data has changed or has been provided to us incorrectly, and this is not contrary to the purpose of processing, it must be corrected, and you must notify us of this.

It is our obligation to strive to comply with the requirement of accuracy, but naturally, if you become aware that we are processing your data incorrectly, you must inform us of this fact.

II./6. Storage limitation

Personal data are stored in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed. After this period, the data are erased. Our IT system has been designed so that electronically stored data are deleted by the deadline. The exact period of data storage and the rules for data disposal are regulated in our Privacy Policy, and we always act in accordance with this. We do not store data unnecessarily.

Your personal data will only be stored for longer than the above period if the processing of personal data is carried out in accordance with the GDPR for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, with due regard to the implementation of appropriate technical and organisational measures as required by the GDPR for the protection of your rights and freedoms.

II./7. Integrity and confidentiality

We process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. We have set up data storage so that unauthorised persons, even within the company, cannot access the data. For example, an expert staff member does not use online store order data and does not participate in the process, so we have set the organisational access privileges so that they cannot see this data.

II./8. Accountability

The Controller is responsible for compliance with data protection rules and must also be able to demonstrate such compliance. But how does this happen? Who holds a Controller to account? Naturally, the authority. In Hungary, this is primarily the Hungarian National Authority for Data Protection and Freedom of Information, abbreviated as NAIH.

In the event of a report (but sometimes ex officio), the NAIH examines whether processing by the given company is lawful and fully complies with all legal requirements. In such an investigation, the Controller must

be able to prove and demonstrate that it carries out its processing in accordance with the law. An important part and means of this is the existence of a privacy policy, in which the processing must be regulated lawfully. Another important aspect is that if we have a good policy, i.e. one that complies with the law, we carry out our processing in accordance therewith. A good policy alone is not sufficient. The Controller has developed a data processing and data security policy for its entire processing operation and carries out its processing accordingly.

III. Lawfulness of processing

When designing our processing operations, we always ensure that the processing of data is lawful in accordance with the principle of lawfulness. We carry out our processing on the basis of the following legal grounds for processing, taking into account the highlighted detailed rules.

III./1. Consent of the data subject

You have given your consent to the processing of your personal data for one or more specific purposes. It is important that consent is given voluntarily and that you always provide your consent by an active action.

III./2. Performance of a contract

Processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.

III./3. Legal obligation

Processing is necessary for compliance with a legal obligation to which we are subject. We only process data on the legal basis of a legal obligation if there is a statutory requirement. We do not use legal obligation as a legal basis for processing if the statutory provision is conditional.

III./4. Vital interest

Processing is necessary in order to protect your vital interests or those of another natural person. An important aspect when choosing this legal basis is that processing on the grounds of vital interests is temporary and may only last as long as the vital interest exists. The rules for processing data after the vital interest ceases are regulated separately.

III./5. Public interest or exercise of official authority

In this case, processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. We are not considered an authority and do not carry out processing in the public interest, so we do not currently process data on this legal basis.

III./6. Legitimate interest

Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where the data subject is a child. In our processing activities, we often process data on this legal basis.

In the case of processing based on legitimate interests, we have always carried out an interest assessment test, in which we examined the proportionality and necessity of the impact and restriction on your fundamental rights and freedoms.

IV. Data security

The Controller is committed to protecting personal data against loss, unlawful use, unlawful transmission, alteration, unavailability or destruction, and takes all necessary measures to maintain the confidentiality of personal data, including the use of appropriate technical and organisational measures.

Organisational measures include controlling physical access in our buildings, training employees, and storing paper-based files in appropriate rooms. Technical measures include encryption related to access to our systems, password protection, and the use of antivirus software.

As part of the process by which you provide us with your personal data, this data may also be transmitted over the internet. Despite taking all necessary measures to protect the personal data you provide to us, data transmission over the internet cannot be considered completely secure. Accordingly, you must acknowledge and accept that we cannot take full responsibility for the security of data transmitted via our website, and such transmission is at your own risk. However, once your personal data has reached our systems, we adhere to strict procedures to ensure security and to prevent unauthorised access.

In cases where we have provided you with (or you have chosen) a password, you are responsible for keeping this password confidential. We ask that you do not share this password with anyone.

Our websites and social media pages may from time to time contain links to websites operated by third parties, including member company websites and partner networks; the processing of data on these sites is not part of our activities.

V. Cookie management

V./1. What is a cookie?

A cookie is a small text file that is placed on your computer when you visit a website. Cookies have several functions, including collecting information, remembering user settings, and enabling the website owner to learn about user habits to enhance the user experience. You can manage your cookie settings at any time in your browser settings.

V./2. Why do we use cookies?

- We use cookies to improve our sites,
- To enhance the user experience,
- To facilitate the management of our sites,
- To obtain information about user habits,
- To place targeted advertisements.

V./3. What cookies do we use?

Strictly necessary cookies

Strictly necessary cookies help make our website usable by enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Preference cookies

By using preference cookies, we can remember information that changes the behaviour or appearance of the website, such as your preferred language or the region you are in.

Statistics cookies

Through the collection and reporting of data in an anonymous form, statistics cookies help the website owner understand how visitors interact with the website.

Marketing cookies

We use marketing cookies to track visitors' website activity. The objective is to publish relevant advertisements to individual users and encourage their engagement, which makes our website more valuable for both content publishers and third-party advertisers.

The purpose of using these cookies is to display relevant advertisements and content by creating user groups. This process is carried out manually.

These cookies are stored on your device by the system. These cookies are not suitable for identifying individuals.

We use remarketing services, such as the Google AdWords remarketing service, to deliver personalised advertisements to you. You can disable these cookies in the [Google Ads settings manager](#) by following the instructions provided there. You can find information about Google's advertising privacy policy [by clicking here](#).

V./4. Cookie settings

By default, all browsers allow the use of cookies. If you wish to delete cookies from our sites or do not want to use them, please refer to the links below depending on which browser you use:

- [Google Chrome](#)
- [Edge](#)
- [Firefox](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Internet Explorer 10](#)
- [Microsoft Internet Explorer 9](#)
- [Microsoft Internet Explorer 8](#)

- [Safari](#)

Please note that if you disable cookies, certain elements or the full functionality of the website may not be available.

V./5. Information on processing related to cookies

Purpose of processing

Strictly necessary cookies: ensuring the proper functioning of the website.

For other cookies:

Development of our website, facilitating your navigation on our website and the use of its functions, thus ensuring a seamless user experience, collecting information about the use of our website, placing targeted advertisements on other websites (remarketing), tracking activities performed on the website to deliver specifically relevant offers to you, and sending personalised offers to the contact details provided during registration.

Legal basis for processing

For strictly necessary cookies:

The legal basis for processing is “the necessity of processing for the purposes of the legitimate interests pursued by the Controller or by a third party” as set out in Article 6(1)(f) of the GDPR.

For other cookies:

The data subject’s consent – “the data subject has given consent to the processing of their personal data for one or more specific purposes” as set out in Article 6(1)(a) of the GDPR;

Presentation of legitimate interest

Without cookies, the website cannot function fully in all its features, and thus the website cannot fulfil its purpose. On the other hand, the website needs to be protected against potential attacks. Therefore, the Controller has a compelling legitimate interest in recording the online identifier (IP address) of users visiting the website, which qualifies as personal data, as well as other personal data generated in connection with browsing (time of browsing, type of browser, certain characteristics of the device’s operating system used for browsing; such as type of operating system and set language), and thus to prevent external attacks targeting the website and public electronic services. For all these reasons, the Controller operating the website has a legitimate interest in the use of strictly necessary cookies.

Categories of data subjects

Natural persons visiting the website

Categories of personal data

The online identifier (IP address) of users visiting the website, which qualifies as personal data, as well as other personal data generated in connection with browsing (time of browsing, type of browser, certain characteristics of the operating system of the device used for browsing; such as type of operating system and set language)

Name of the cookie, provider, purpose of the cookie, type, and the duration of processing for this purpose:

You can obtain more detailed and up-to-date information about this by clicking on the cookie information at the bottom of the website.

Is it mandatory to provide personal data, and consequences of failure to provide data

For strictly necessary cookies: Yes

Without this, you cannot access the site and it cannot be used properly.

Enabling other cookies is not mandatory

Information on the existence of automated decision-making

Automated decision-making procedures are expected to be carried out by the Controller during data processing for this purpose.

VI. The various data processing operations

VI./1. Processing of data of people requesting information, enquiring about services, or requesting quotes (online via email, or by post, telephone, or in person)

The Controller processes data of potential clients in accordance with the rules set out in this section in the event of enquiries. This section covers both online and offline enquiries, in particular information requests made in person, by post, telephone, or email.

These enquiries are made for the purpose of fulfilling contracts to be concluded later, and the legal basis has been selected accordingly. Our Company also strives to minimise processing in the course of this activity.

Purpose of processing:

Answering questions from potential clients/partners related to contract performance, providing quotations as preparation for a future contract

Legal basis for processing:

Article 6(1)(b) of the GDPR, second subparagraph: “processing is necessary in order to take steps at the request of the data subject prior to entering into a contract”

Categories of data subjects:

People requesting information, enquiring about services, or requesting quotes

Categories of personal data:

Name, email address, telephone number

Duration of processing for this purpose:

Until withdrawal by the data subject.

When the service becomes available, at the time it becomes available

In the case of an information request, until a response is provided

In the case of a quotation, until the offer is accepted or rejected, or until the validity period of the offer expires

Is it mandatory to provide personal data, and consequences of failure to provide data:

Not mandatory.

If the name is missing, we cannot address you personally.

If the email address is missing, we cannot notify you by email about the availability of the service

If the email address is missing, we cannot send you a quotation

If the telephone number is missing, we cannot call you back and arrange a personal consultation

Recipients of personal data:

Email service provider

Is data transferred to a third country or to an international organisation?

The data transferred for this purpose are not transferred to a third country or to an international organisation.

Information on the existence of automated decision-making:

No automated decision-making takes place during the processing of data transferred for this purpose.

VI./2. Processing related to the performance of contracts

The Controller provides its services within its scope of activities on the basis of contracts concluded between the parties. This section regulates processing necessary for the performance of contracts. This section covers all processing carried out by the Controller due to a contractual relationship (whether in written or oral form, or even by implied conduct), regardless of whether our Company provides or receives the service. However, this section does not cover processing related to employment contracts.

Purpose of processing:

Conclusion of contracts and performance of contractual obligations, exercise of contractual rights.

Legal basis for processing:

Performance of contracts – “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” as set out in Article 6(1)(b) of the GDPR.

Categories of data subjects:

Natural person contracting parties

Categories of personal data:

Name, address, place and date of birth, mother’s name, telephone number, email address, other data specified in the contract

Duration of processing for this purpose:

Until the performance of the contract, or in the event of termination of performance for any reason, until the termination of the contract

Is it mandatory to provide personal data, and consequences of failure to provide data:

Yes

In the absence of the data, the contract cannot be concluded.

Recipients of personal data:

Accountant

Post, courier service

Email service provider, SMS service provider

Other performance assistants or subcontractors involved in the performance with prior information

Is data transferred to a third country or to an international organisation?

The data transferred for this purpose are not transferred to a third country or to an international organisation.

Information on the existence of automated decision-making:

No automated decision-making takes place during the processing of data transferred for this purpose.

In the event of performance of the contract or termination of the contract for any reason without performance, we continue to process the data on the basis of legitimate interest, for which the interest assessment test was carried out in Section **Hiba! A hivatkozási forrás nem található.** Dormant processing.

VI./3. Billing and other accounting data processing

Purpose of processing:

Retention of invoicing and accounting data for the fulfilment of obligations set out in the Accounting Act

Legal basis for processing:

The Controller processes invoicing and other accounting data lawfully under the GDPR, as it is required to do so by law.

Legal obligation – “processing is necessary for compliance with a legal obligation to which the controller is subject” as set out in Article 6(1)(c) of the GDPR;

Act C of 2000 on Accounting – Section 169(1)-(6)

Categories of data subjects:

Hotel guests, other participants in accounting processes (e.g. actual payer)

Categories of personal data:

Name, address, other data required by law or indicated at the request of the client.

Duration of processing for this purpose:

As set out by law, as a general rule for a period of 8 years.

Is it mandatory to provide personal data, and consequences of failure to provide data:

Mandatory,

in the absence of data provision, we cannot fulfil our legal obligations

Recipients of personal data:

Accountant, supervisory authorities, email service provider, post

Our banking service provider is Gránit Bank

Is data transferred to a third country or to an international organisation?

The data transferred for this purpose are not transferred to a third country or to an international organisation.

Information on the existence of automated decision-making:

No automated decision-making takes place during the processing of data transferred for this purpose.

Processor:

Our accounting is managed by Corient Accounting Kft. (H-1026 Budapest, Pasaréti út 122-124)

VI./4. Processing of complaints handling data**Purpose of processing:**

Fulfilment of legal obligations arising from warranty and guarantee claims, and handling of other complaints

Legal basis for processing:

The Controller processes data lawfully under the GDPR, as it is required to do so by law.

Legal obligation – “processing is necessary for compliance with a legal obligation to which the controller is subject” as set out in Article 6(1)(c) of the GDPR;

Act C of 2000 on Accounting – Section 17/A(7) “The business shall retain the minutes recording the complaint as well as a copy of its response for a period of five years, and it shall present them to investigating authorities upon request.”

The main rules for defective performance are set out in Chapter XXIV of the Civil Code, but other laws may also apply

Categories of data subjects:

Persons making warranty and guarantee claims and other complainants

Categories of personal data:

Name, address, on the basis of legal obligation, pursuant to Section 17/A(5) of Act CLV of 1997, the record of the complaint must include the following: a) the consumer's name and address
Other data required by law and provided by the complainant may also be processed, about which the complainant will be informed in the complaints handling record.

Duration of processing for this purpose:

As set out by law, as a general rule for a period of 5 years.

Is it mandatory to provide personal data, and consequences of failure to provide data:

Mandatory,

In the absence of data provision, we cannot remedy your complaint and cannot fulfil our legal obligations

Recipients of personal data:

Email service provider,

Mail and parcel delivery service, courier service

Authorities and courts

Is data transferred to a third country or to an international organisation?

The data transferred for this purpose are not transferred to a third country or to an international organisation.

Information on the existence of automated decision-making:

No automated decision-making takes place during the processing of data transferred for this purpose.

VI./5. Processing of data of job applicants

Purpose of processing:

Advertising job opportunities, filling vacant positions

Legal basis for processing:

The Controller processes the necessary data lawfully under the GDPR for the purpose of preparing a future contract.

Article 6(1)(b) of the GDPR, second subparagraph: "processing is necessary in order to take steps at the request of the data subject prior to entering into a contract"

Categories of data subjects:

Job applicants

Categories of personal data:

Name, telephone number and email address for notification

Required data according to the conditions set out in the job advertisement.

Other data voluntarily provided by the applicant in addition to the conditions

Duration of processing for this purpose:

Until the position is filled or the recruitment process is closed, but for a maximum of 3 months, or until withdrawal by the data subject in the event of withdrawal

Recipients of personal data:

Email service provider

Is it mandatory to provide personal data, and consequences of failure to provide data:

No. In the absence of the minimum data required in the job advertisement, we cannot evaluate the application, and in the absence of contact details, we cannot notify you.

The provision of voluntarily given data is not mandatory, and failure to provide it does not affect the application.

Is data transferred to a third country or to an international organisation?

The data transferred for this purpose are not transferred to a third country or to an international organisation.

Information on the existence of automated decision-making:

No automated decision-making takes place during the processing of data transferred for this purpose.

VI./6. Processing of camera recordings at the registered office of BDPST Koncept Kft.

In the office building where our registered office is located and where we also receive our prospective and existing clients, a camera system has been installed and put into operation for the purpose of protecting life, physical integrity and property (hereinafter referred to as cameras). The cameras record video footage. The reason for their placement is that we handle and store high-value technical equipment and documents containing confidential business secrets in our offices. Furthermore, the protection of the physical integrity and valuables of our employees is of particular importance. The rules relating to the camera system and the interest assessment test are set out in a separate policy.

VI./7. Processing related to the use of social media platforms

BDPST Koncept Kft. uses the following social media platforms:

Facebook

Instagram

TikTok

We would like to draw your attention to the fact that, in addition to our Company, the operator of the platform and its controllers also carry out data processing on our social media platforms. In most cases, we cannot influence the activities of the operator; however, where possible, we facilitate appropriate data processing from a data protection perspective within the options available to us.

The data you provide on our social media platforms (links, images, comments, videos, news) are made public and accessible by the platform, and are not used by our Company for any other purpose. In certain cases, we may share your content on our own platforms (Share button) if the platform provides this option.

Purpose of processing:

Facilitation of our communication activities

Legal basis for processing:

Legitimate interest of the operator of the Controller – for the purpose of facilitating communication, as set out in Article 6(1)(f) of the GDPR.

Categories of data subjects:

Any natural person active on any social media platform

Categories of personal data:

links, images, videos, comments, profile name

Processor:

We Talk Digital Kft. (H-3128 Vizslás, Kossuth Lajos utca 73)

Further information on the processing carried out by the operator of the social media platform and on objecting to data processing can be found in the following privacy notices of the service providers:

•Facebook: <https://www.facebook.com/privacy/explanation>

•Instagram: <https://help.instagram.com/519522125107875>

VI./8. Dormant processing (during the limitation period)

Purpose of processing:

Proof in the course of enforcement of rights following performance of the contract in administrative and judicial proceedings

Legal basis for processing:

The Controller has a legitimate interest in processing data following the performance of the contract, which is lawful

Legitimate interest – “the necessity of processing for the purposes of the legitimate interests pursued by the Controller or by a third party” as set out in Article 6(1)(f) of the GDPR,

The processing of special categories of personal data is lawful under Article 9(2)(f) of the GDPR if processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

Presentation of legitimate interest

The Controller has a legitimate interest in being able to reconstruct events and have appropriate means of proof in the event of administrative or judicial proceedings. After determining the legitimate interest, we have carried out a legitimate interest assessment test, on the basis of which the data processing is lawful.

Categories of data subjects:

Private individual contracting parties, representatives of non-private individual contracting parties, their authorised agents, contact persons

Categories of personal data:

Name, address, place and date of birth, mother’s name, email, telephone number, mailing address, other data provided for performance and data necessary for the enforcement of claims, which may include special categories of data, including health data

Duration of processing for this purpose:

Until the expiry of the limitation period, as a general rule for 5 years.

Pursuant to Section 6:22(1) of the Civil Code, 5 years following the performance of the contract or the termination of the contract for any reason without performance, or, if another limitation period is prescribed by law, until the expiry of that limitation period. We only retain other data that comes into our possession if it may be relevant to the merits of the case or to the subsequent proof of actions.

Is it mandatory to provide personal data, and consequences of failure to provide data:

Yes

In the absence of data provision, we are unable to conclude the contract.

Recipients of personal data:

Email service provider:

Authorities and courts

Legal representative

Is data transferred to a third country or to an international organisation?

The data transferred for this purpose are not transferred to a third country or to an international organisation.

Information on the existence of automated decision-making:

No automated decision-making takes place during the processing of data transferred for this purpose.

VII. Your rights

If you wish to exercise your above rights (request the transfer, erasure, rectification, etc. of your data), please contact us via any of our contact details or by completing the form at the end of this section. You are entitled to the following rights:

VII./1. Right to information

VII./2. Right of access

VII./3. Right to rectification

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VII./1. Right to information

We are obliged to provide information of appropriate size, in the appropriate language, in plain language and easily accessible, on the essential aspects of processing (what, for what purpose, how, from when to when it is used, etc.) – and the GDPR precisely defines the scope of the required information. Where possible, information must be provided before the collection of personal data. If this is not possible – for example, because the data are obtained from a third party – it will be provided at the earliest possible opportunity.

You can read about the right to information in Articles 13-14 of the GDPR.

VII./2. Right of access

You may request information as to whether processing concerning you is taking place, and if so, which of your data we process and under what conditions. The conditions that can be queried are detailed above under the right to information.

You can read about the right of access in Article 15 of the GDPR.

VII./3. Right to rectification

You may notify us if the data processed are inaccurate and request what we should indicate instead. If you become aware that your data are inaccurate or incorrect, please notify us as soon as possible and we will correct them.

You can read about the right to rectification in Articles 16 and 19 of the GDPR.

VII./4. Right to erasure

In cases and under the conditions specified by law, you may request that your data be erased from the database. Such a case is, for example, when the personal data are no longer necessary for the purpose for which they were collected or otherwise processed, or if you withdraw your consent and there is no other legal basis for the processing.

Unfortunately, however, there are cases where we must refuse to erase the data. One such case is if the law requires us to retain the data (for example, data used for invoicing must, as a general rule, be stored for 8 years in accordance with the relevant legislation), but we may also refuse erasure within the limitation period on the grounds of legitimate interest – for example, for possible future proof. And of course, beyond these examples, there are many cases where processing is lawful despite an objection. As is generally the case in data protection, every case is unique and must be individually assessed as to whether the refusal to erase the data is lawful.

You can read about the right to erasure in Articles 17 and 19 of the GDPR.

VII./5. Right to restriction of processing

In cases and under the conditions specified by law, you may request that the processing of your data be restricted (even for a period specified by law). Except for the exceptions specified by law, data subject to restriction may only be stored and no other operation may be performed on them. If the restriction is lifted, we will inform you accordingly.

You may request restriction in the following cases:

- You contest the accuracy of the personal data, in which case the restriction applies a period that enables us to verify the accuracy of such personal data.
- If the processing is unlawful but you oppose the erasure of the data, you may request the restriction of their use instead.
- The Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims.

- You have objected to processing, pending the verification whether the legitimate grounds of the Controller override yours.

You can read about the right to restriction in Articles 18 and 19 of the GDPR.

VII./6. Right to data portability

You may request to receive the data concerning you, which are processed, in a structured, commonly used and machine-readable format (e.g. .doc, .pdf, etc.), and you are also entitled to transmit those data to another Controller without hindrance from the original Controller. That is, the GDPR framework facilitates the position of the data subject to transfer their personal data from one Controller to another. However, this is only possible if the processing is carried out by automated means.

You can read about the right to data portability in Article 20 of the GDPR.

VII./7. Right to object

You are entitled, in certain cases, to object to the processing of your data. In the event of an objection, we may not process the personal data unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or which are necessary for the establishment, exercise or defence of legal claims, or for proceedings before an authority or court.

In certain cases, you have the right to request not to be subject to automated decision-making if you wish this not to apply to you. The primary condition for this is that it is not necessary for the conclusion or performance of the contract between you and us, and that the law does not require automated decision-making in the given matter.

You can read about the right to object and automated decision-making in Articles 21-22 of the GDPR.

VIII. Where to seek legal remedy

First of all, please feel free to contact us; we will do our utmost to resolve your issue. If this does not succeed, or you do not wish to do so, you may contact the data protection authority or open proceedings before a court. Contact details of the data protection supervisory authority in Hungary:

Hungarian National Authority for Data Protection and Freedom of Information

Postal address: H-1363 Budapest, Pf.: 9
 Address: H-1055 Budapest, Falk Miksa utca 9-11
 Telephone: +36 (1) 391-1400
 Fax: +36 (1) 391-1410
 Email: ugyfelszolgalat@naih.hu
 Website: <https://naih.hu>

Right to turn to the courts:

If your data subject rights are infringed, you may also bring proceedings against the Controller before a court. You may bring such proceedings before the court competent according to your habitual residence or place of stay.

IX. Validity of this Policy

This Policy is valid from 22 May 2025 until revoked